

IV. Draft of Product Stewardship Annual Report Evaluation (Carpet)

Note: this is a discussion outline providing guidance on criteria for report approval. The final proposed regulations will include other sections on: submittals, payments to CalRecycle, records retention, confidentiality, enforcement, and other topics as noted below. These will eventually be combined into one document.

I. See: Definitions

II. See: Stewardship Submittal Instructions

III. See: Criteria for Approval of the Plan

IV. Criteria for Evaluation of the Report:

CalRecycle staff shall use the criteria below to review annual report contents and determine if they meet the requirements in statute and regulation (*cite regulation*). This section first describes the requirements (stated or inferred) in AB 2398 Product Stewardship for Carpets, followed by a description of how CalRecycle will evaluate the requirements.

The report must contain the following:

1. **Contact information.** Identify the manufacturer or stewardship organization responsible for the annual report submittal.

How this criterion will be evaluated:

CalRecycle shall verify that the manufacturer or stewardship organization has registered on-line with CalRecycle.

2. **Executive Summary.** Provide an evaluation of the effectiveness of the carpet stewardship plan, and anticipated steps, if needed, to improve performance.

How this criterion will be evaluated:

- a. CalRecycle shall review for completeness.
 - b. The report demonstrates through measureable activities that over time source reduction, reuse and recycling increased, while environmentally safe transformation and land disposal decreased.
 - c. The report demonstrates continuous improvement toward achievement of goals.
 - d. The report covers progress toward achievement of all goals in the approved plan.
3. **Scope.** The program described in the plan accepts and manage all applicable postconsumer carpets.

How this criterion will be evaluated:

- a. The report may reference the scope as described in the approved stewardship plan if no changes to scope have occurred.
 - b. Changes in the program scope shall be identified.
- 4. **Program Outline.** Describe the product stewardship program, including information on the following topics:
 - a. Types of collections sites and basic information about recycling facilities in California, e.g., how carpet is collect, number and location of processors.
 - b. Include facility name(s) and address(es) for each method of disposition.

How these criteria will be evaluated:

The department shall review for completeness.

- 5. **Description of Goals and Activities Based on the Stewardship Plan.** State goals from the approved plan, the baseline from which goals were measured, and report on achievement during the reporting period.

How these criteria will be evaluated:

- a. Provide specific information on the measurement methodology and data sources.
- b. Program data shall be collected for purposes of annual report submittal. Data shall be California specific. The annual report shall include, but is not limited to, quantitative information and discussion on the following categories (see *Table: Overview of Data Collection*):
 - i. Amount of carpet sold by square yards and weight, in the state during the reporting period that is covered under the approved plan. A carpet stewardship organization with more than one manufacturer may use average weight.
 - ii. Amount of postconsumer carpet that is available for collection.
 - iii. Amount of postconsumer carpet collected, by weight, during the reporting period.
 - iv. Disposition of collected postconsumer carpet, by weight, during the reporting period.
 - v. Describe efforts to increase recycling of postconsumer carpet.
 - vi. Describe efforts to increase diversion of postconsumer carpets from landfills.
 - vii. Describe efforts to increase recyclability of carpets.
 - viii. Regulatory non-compliances
 - ix. Describe efforts to increase to incentivize the market growth of secondary products made from postconsumer carpet.

Table: Overview of Potential Data Collection**Note: throughout table units to report in need to be identified**

This table has some elements that are not required in AB 2398, but may assist in the overall evaluation of the program over the long term. The table should be refined to indicate what data shall be collected and by whom.

Population (insert year)
Financing
Total program cost (\$)
Cost(\$)/capita
Cost (\$)/unit collected
Education/Outreach (% of total program cost)
End-of-life materials management (% of total program cost with line items for reuse, recycling, incineration for energy recovery, and landfilling))
Program administration (% of total program cost)
Governance (program oversight) (% of total program cost)
Total cost to local government (if applicable)
Assessment funds collected, how spent and amounts of each major expenditure
Surplus funding, if any (by statute these funds are meant to be used to reduce program costs)
An evaluation of the assessment rate
Environmental
Materials management
Product sold (mass or volume)
Product collected (mass or volume)
Product sold that is available for collection (describe methodology used)
Amount and Percent collected (from available for collection)
Amount and Percent reused
Amount and Percent recycled
Amount and Percent incinerated for energy recovery
Amount and Percent landfilled
GHG emissions (tons)
Investments in product design/R&D
Program effectiveness
Progress against goals
Regulatory non-compliances
Demonstrated improvements in product design
Public awareness

Public participation ¹
Jobs attributable to stewardship program (Direct/Indirect²)
Local Government
Product Stewards
State Government
Materials extraction, processing, & manufacturing
Collectors & Recyclers
Retailers & Installers

- 6. Market Development.** After four (4) years of program implementation, the manufacturer or stewardship organization shall include a description of possible market development activities to incentivize the market growth of secondary products made from postconsumer carpet.

How this criterion will be evaluated:

- a. CalRecycle shall review for informational purposes only.

- 7. Financing Mechanism.** The report shall include a description and evaluation of the program's financing mechanism, including whether or not the funding was sufficient to recover, but not exceed, the full cost of the product stewardship program.

How these criteria will be evaluated:

The annual report shall include the total cost of implementing the carpet stewardship plan, including, but not limited to, items a. through i., below, and any necessary supporting documents. Any proposed change in the amount of the carpet stewardship assessment fee must be submitted to CalRecycle for re-approval (See Stewardship Plan Approval regulations (*cite regulation #*))

The total cost of implementing the carpet stewardship plan (see *Table: Overview of Data Collection*).

- a. Cost(\$)/capita
- b. Cost (\$)/unit collected
- c. Education/Communications (% of total program cost)
- d. EOL materials management (% of total program cost)
- e. Program administration (% of total program cost)
- f. Governance (program oversight) (% of total program cost)
- g. Total cost to local government (if applicable)
- h. Assessment funds collected, how spent and amounts of each major expenditure

¹ Via survey results or other reported data.

² "Direct" refers to number of jobs directly attributable to the manufacturer or stewardship organization employees working on the program. "Indirect" refers to # of jobs estimated attributable to contracted service providers. May be expressed in units of full-time equivalents (FTEs).

- i. Surplus funding, if any (by statute these funds are meant to be used to reduce program costs)
 - j. An evaluation of the assessment rate
8. **Outreach/Education.** List educational outreach activities in the plan. Provide a description of educational materials that were provided to retailers, consumers, carpet removers/installers, contractors, during the reporting period (provide electronic samples). Identify the method used to determine the effectiveness of educational and outreach surveys (e.g., surveys, hits on specific web pages, number of participants at events, etc). These education and outreach materials may include, but are not limited to, any of the following:
- a. Signage that is prominently displayed and easily visible to the consumer.
 - b. Written materials and templates of materials for reproduction by retailers to be provided to carpet installation contractors and consumers at the time of purchase or delivery or both.
 - c. Promotional materials or activities, or both, that explains the purpose of carpet stewardship and the means by which it is being carried out.
 - d. Links to website(s) created and maintained by the organization.

How these criteria will be evaluated:

The report includes the extent of public awareness and participation. (see *Table: Overview of Data Collection*)

- a. The results demonstrate positive effectiveness of education and outreach efforts.
9. **Audits.** The report shall include an independent financial audit funded from the carpet stewardship assessment.

If the department decides to further review the findings of the independent auditor, the review will be conducted based on same information the individual manufacturer or stewardship organization provided to the independent auditor. The department may request supplemental information from the individual manufacturer or stewardship organization during the course of review of audit, if necessary. The department will inform the individual manufacturer or the stewardship organization within 60 days of the results of its review.

How this criterion will be evaluated:

- a. CalRecycle shall review for informational purposes and may investigate further.

IV. See: [Enforcement](#)

V. See: [Record Retention](#)

VI. See: [Proprietary, Confidential, or Trade Secret Information](#)

VII. See: [Service Payments to CalRecycle](#)

Discussion Draft